ENSV Inspection Transmittal Summary Report

Media:
RCRA CONTRACTO

Inspection Type:
CEI

Inspection Date:
06/16/2015

Preliminary SNC Findings:

Transmittal Date:

NOV / NOPV / NOPF:
Yes

Inspector:
TTE CONTRACTOR TTE CONTRACTOR

Facility Name:
Recycletronics

Address:
3313 Northbrook Drive
Sioux City
IA
51105

ID Number: [redacted]

Activity Number:

MM Participationg Progams:

Exemption 2

Federal Activity:
CRT recycling and exporting of leaded glass to Mexico.

Federal Facility:
No

Potential EJ:
No

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
Yes	Yes	Yes	No	EDWIN BUCKNER

Selection Criteria 1:
Complaint/Case Development

Selection Criteria 2:

ACS Code:

Inspection Findings:
Failure to operate facility as to minimize chance of a release of HW.

Target Quality:

571450

DATE:

SUBJECT: Review of Contractor Inspection Report

FACILITY: Recycletronics

LOCATION: Sioux City, IA

NOPF RESPONSE: None received

FROM: WEMM Reviewer/Name: _____

Please Review & Return

TO: TOCOR/Gary R. Witkovski, ENSV/EFCB

Unresolved Issues and Ideas for Program Improvement:

1. _____

2. _____

3. _____

4. _____

5. _____

6. _____

7. _____

8. _____

9. _____

10. _____

-continue on back if necessary-

DATE: July 14, 2015

SUBJECT: Review of Contractor Inspection Report

FACILITY: Recycletronics Draft: First

LOCATION: Sioux City, IA

TO: Contract Inspector/Name: Heather K Wood/TTE

The referenced report is:

___ Accepted: Any listed comments are for future improvement.

_X_ Not Accepted: Address the items listed below as critical, as well as for future improvement.

Issues/Concerns/Problems/Ideas for improvement:

1. Page 4-Did you question Mr. Rochester about the satellite imagery of October 14, 2014, which shows containers being staged outside the building. If so, what was his explanation?

2. Page 6-Please indicate the label on the container in photo 27. I was unable to observe, in photo #27, the label you are referencing.

3 See additional suggestions and comments in the report.

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

RECYCLETRONICS
3313 Northbrook Drive
Sioux City, Iowa 51105
712-224-3158

EPA ID Number: Non-notifier

On

June 16, 2015

By

TOEROEK ASSOCIATES, INC.

For

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Environmental Sciences & Technology Division

INTRODUCTION

At the request of the Environmental Sciences & Technology Division and the Air and Waste Management Division of the U.S. Environmental Protection Agency (EPA) Region 7, Toeroek Associates, Inc. and its subcontractor Tetra Tech, Inc. (Toeroek team) conducted a hazardous waste compliance evaluation inspection (CEI) at Recycletronics at 3313 Northbrook Drive, Sioux City, Iowa. The CEI was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. As requested by the EPA compliance officer for the facility, the CEI covered hazardous waste generator requirements, used oil management, and universal waste requirements. This report and its attachments present the results of the CEI. The Toeroek team also conducted a Level B multimedia screening inspection at Recycletronics. The Multimedia Screening Checklist is included as Attachment 1.

PARTICIPANTS

Recycletronics:

Aaron Rochester, Owner/President

Toeroek Team:

Heather Wood, Lead Inspector, 816-412-1787

INSPECTION PROCEDURES

Prior to the CEI at Recycletronics on June 16, 2015, I conducted a drive-by inspection. I observed a number of large containers of electronic equipment stored behind the building. I entered through the front door and informed office staff that I was there to conduct a CEI. Mr. Rochester arrived while I was speaking and conducted me to his office. I presented my business card and EPA credential letter, and explained the procedures for the CEI. I explained the facility's right to make confidentiality claims and provided Mr. Rochester the Confidentiality Notice (Notice), which he read. I stated that, at the conclusion of the CEI, he would be given an opportunity to make or not make a claim of confidentiality for the facility. I also provided Mr. Rochester a copy of U.S. Federal Codes 1001 and 1002, concerning communication of false statements and documents to federal inspectors, and RCRA Section 3007, explaining my inspection authority. Both of these he read.

A copy of each of the following documents was left at the facility during the inspection:

- Inspection letter and EPA Representative Mr. Gary Witkovski's business card
- RCRA Section 3007
- U.S. Federal Codes 1001 and 1002
- Compliance Assistance Centers Flyer
- Compliance Assistance Centers Pamphlet
- Industry Sector Notebooks
- Innovative Solutions to your Environmental Challenges: Sector Specific Resources
- Instructions for Responding to a Notice of Preliminary Findings
- Iowa Department of Natural Resources Pollution Prevention Services Pamphlet
- Iowa Department of Natural Resources Pollution Prevention Services Packet
- Iowa Department of Natural Resources Iowa Waste Exchange
- Iowa Environmental Guide for Business
- Iowa Waste Reduction Center On-Site Review Program
- Managing Your Hazardous Waste: A Guide for Small Businesses
- The National Compliance Assistance Clearinghouse
- Notification of Regulated Waste Activity: Instructions and Forms
- RCRA Online: A Quick Reference Guide
- Supplemental Information for Small Businesses Subject to an U.S. EPA Enforcement Action
- U.S. EPA Small Business Resources.

I reviewed the RCRA Info Data Verification Handler Information Report with Mr. Rochester (see Attachment 2). I updated the Handler Information Report with (1) the North American Industry Classification System code, (2) mailing address, (3) site contact information, (4) facility ownership information, (5) facility operator information, and (6) waste codes for wastes handled at the facility. I conducted the visual inspection of the facility, accompanied by Mr. Rochester. I also reviewed the facility's records, including shipping records notices and waste analyses. Facility information gathered during the CEI is documented on the Data Gathering Worksheets and Checklists (see Attachment 3).

I conducted an exit briefing with Mr. Rochester at the conclusion of the CEI. I provided a Receipt For Documents And Samples, which Mr. Rochester signed, acknowledging receipt (see Attachment 4). I also provided Mr. Rochester the Notice, which he signed to indicate no confidential business information (CBI) had been provided (see Attachment 5). I then provided Mr. Rochester a Notice of Preliminary Findings (NOPF), which he signed to acknowledge receipt (see Attachment 6). An aerial photograph showing the facility is included as Attachment 7. Of the 35 photographs taken during the CEI, 33 are included in Attachment 8.

FINDINGS AND OBSERVATIONS

1. Facility Description and General Information

Recycletronics processes electronic equipment for recycling. The facility processes cathode ray tubes (CRT) for recycling by separating leaded glass from other components. Other electronic equipment, such as printers, is received by the facility, then sold to brokers for reuse or recycling with no additional processing. Recycletronics began operations at this location in 2013 and currently has seven employees, all full time. Mr. Rochester stated that the facility runs one shift, Tuesday through Friday, from 7:30 a.m. to 5:30 p.m. The facility is housed in a single building that covers approximately 18,000 square feet (see Attachment 7 and Attachment 8, Photographs 1 and 2). An accounting firm and a bus charter company share the Recycletronics offices.

Electronic equipment, including computer monitors, computers, printers, and televisions, is delivered to the facility by truck. I asked to review records of deliveries to the facility, but Mr. Rochester said that the computer with all relevant records had crashed the previous week. He said that he might be able to provide the records after the inspection, when the computer would have been repaired. I contacted Mr. Rochester by email on June 23 and July 1 to see if the documents had been recovered (see Attachment 9), but he said that they were still trying to restore the computer hard drive.

According to Mr. Rochester, under normal conditions, the equipment would be stored in the warehouse until it could be processed (see Attachment 8, Photographs 3 through 5). Inside the warehouse, I observed approximately 200 1-cubic-yard cardboard containers of equipment awaiting processing (see Attachment 8, Photograph 6). Mr. Rochester said that these containers had arrived for processing within the previous 30 days.

However, he said that a recent surge in deliveries within the previous 30 days had required him to stage equipment for processing behind the warehouse (see Attachment 8, Photographs 7 through 14). During my inspection, I observed approximately 30 1-cubic-yard cardboard containers outside, behind the warehouse. Some of the containers were in poor condition (see Attachment 8, Photograph 14), and I observed broken plastic and metal scrap on the concrete pad and on the unpaved ground (see Attachment 8, Photographs 15 through 18). According to Mr. Rochester, these containers had been staged outside only within the previous 30 days. However, satellite imagery from October 14, 2014, which I downloaded from Google Earth after the inspection, appears to show containers staged behind the building (see Attachment 7). I did not have the photograph at the time of the inspection, and I did not ask Mr. Rochester about the apparent containers.

According to Mr. Rochester, only CRTs are processed at the facility. All other electronic equipment is bundled on pallets and sold as-is to brokers for reuse or recycling. CRTs are removed from monitors and television sets. The resulting debris is separated into scrap metal and scrap plastic, both of which the facility recycles. The facility considers scrap metal exempt from the definition of solid waste and considers scrap plastic nonhazardous waste, based on product and process knowledge. All remaining debris from processing CRTs, such as wood paneling, is consolidated with the general trash. The facility considers the general trash nonhazardous, based on product and process knowledge. No other wastes are generated by the facility. Mr. Rochester said that he could not remember any time when fluorescent lamps had been replaced in the 2 years that the facility had occupied the building.

The CRTs are taken to the glass room (see Attachment 8, Photograph 19), where they are separated into leaded and unleaded glass debris. The facility recycles the leaded glass and considers it exempt from the definition of solid waste. Unleaded glass is considered nonhazardous, based on analysis.

Neither EPA Region 7 nor its contractors have previously conducted a CEI at the Recycletronics facility.

2. RCRA Status

Recycletronics has not notified EPA of any hazardous waste activity (see Attachment 2). Based on statements from the facility and my visual inspection, I concluded that the facility is a nongenerator of hazardous waste. Mr. Rochester stated during the inspection that all CRTs received typically are processed and sent for recycling within a month, and that the oldest leaded glass at the facility is less than 6 months old. However, records related to total materials received for processing and total materials sent for recycling were not available at the time of the inspection (see Attachment 9). As a result, I could not confirm that the facility was not speculatively accumulating leaded glass.

If the facility is speculatively accumulating leaded glass, as defined by Title 40 *Code of Federal Regulations* (40 CFR) 261.1(c)(8), the exemption in 40 CFR 261.39(c) would not apply. In this case, the facility would be operating as a large quantity generator (LQG), generating more than 1,000 kilograms of hazardous waste per month. If the facility is an LQG, hazardous waste would have been accumulated longer than 90 days without a permit, as required by RCRA Section 3005. The facility would have also failed to maintain a contingency plan, failed to provide introductory and annual training, and sent hazardous waste for disposal or recycling without a manifest.

3. Waste Streams

This section of the CEI report describes the waste streams generated by the facility, including the facility's waste determination and waste codes, generation process and rate, management at the facility, and ultimate disposition. The following discussion of waste streams is based on conversations with Mr. Rochester, the visual inspection, and my review of documents. During the visual inspection, I was accompanied by Mr. Rochester. The visual inspection included the warehouse, the glass room, and the concrete pad behind the warehouse. All inspection participants were provided a copy of U.S. Federal Codes 1001 and 1002, which they read.

Leaded glass debris is generated when the leaded funnel of the CRT is separated from the unleaded portions of the CRT. At this point, the intact CRTs become processed in accordance with the definition for CRT processing in 40 CFR 260.10. According to Mr. Rochester, the leaded glass debris is collected by either Closed Loop Refining and Recovery (CLRR) of Phoenix, Arizona, to be recycled in its smelter facility in Columbus, Ohio, or by Technologies Displays America (TDA) of Calexico, California, to be recycled at its sister company's smelter in Mexicali, Baja California, Mexico. Because TDA receives the glass and sends it to Mexico, Recycletronics considers TDA to be the exporter. Because of his computer

difficulties, Mr. Rochester was not able to provide documentation of shipments to CLRR, but he was able to obtain copies of shipping documentation from TDA (see Attachment 10). Mr. Rochester said that the most recent shipment to TDA had occurred in July 2014.

Because of his computer difficulties, Mr. Rochester also said that he was unable to provide a generation rate for leaded glass debris. He estimated that the facility had received approximately six semi-truck trailers of CRT monitors and televisions within the previous month. During the visual inspection, I observed approximately 60 1-cubic-yard cardboard containers of leaded glass debris in the warehouse (see Attachment 8, Photographs 20 through 27) and approximately 40 containers in the glass room (see Attachment 8, Photographs 28 and 29). Mr. Rochester estimated that the containers in the warehouse had been accumulating for approximately 6 months, and that the containers in the glass room had been accumulating for approximately 2 months.

Approximately 25% of the containers were labeled as CRT glass (see Attachment 8, Photograph 27). Because of the fragility and weight of the debris and the condition of some of the containers (see Attachment 8, Photographs 30 and 31), I did not request that the facility move the containers so I could examine them further.

Because the facility was not exporting CRTs or CRT glass, I inspected it for the requirements of the exemption in 40 CFR 261.39(b). I did not observe any broken CRTs awaiting processing, so I concluded that the requirements of 40 CFR 261.39(a) did not apply. All processed CRT glass (leaded glass debris) was stored inside the warehouse building, and all processing activities were conducted in the glass room, as required by 40 CFR 261.39(b)(2)(i). No heating processes were used to separate the leaded glass and unleaded glass parts of the CRTs, as required by 40 CFR 261.39(b)(2)(ii). Leaded glass debris was being recycled at a lead smelting facility, as required by 40 CFR 261.39(c) and not being used in a manner constituting disposal, as required by 40 CFR 261.39(d). However, as described in Section 2, because of Mr. Rochester's computer difficulties, I was not able to independently verify that the facility was not speculatively accumulating leaded glass debris, as required by 40 CFR 261.39(b)(1) referencing 261.39(a)(4) and 261.1(c)(8).

Unleaded glass debris is generated when the leaded funnel of the CRT is separated from the unleaded portions of the CRT. The facility has determined that the unleaded glass is nonhazardous based on analysis (see Attachment 11). Mr. Rochester said that the facility had generated approximately 24 cubic yards of unleaded glass debris per month. I observed 12 cardboard, 1-cubic-yard containers of unleaded

glass debris in front of the warehouse (see Attachment 8, Photograph 32). According to Mr. Rochester, unleaded scrap debris is collected by Gill Hauling of Sioux City, Iowa, to be used as aggregate or fill.

Scrap metal is generated during removal of CRTs from televisions and computer monitors. Because the scrap metal is recycled, the facility considers it exempt from the definition of solid waste, and thus not a hazardous waste per 40 CFR 261.1(c)(9) and 261.4(a)(13). Mr. Rochester estimated that the facility generates approximately 20 cubic yards of scrap metal per day. I observed scrap metal in a rolloff container in front of the warehouse (see Attachment 8, Photograph 33). According to Mr. Rochester, scrap metal is collected for recycling by Compressed Steel of Sioux City, Iowa.

Scrap plastic is generated during removal of CRTs from televisions and computer monitors. The facility has determined that scrap plastic is nonhazardous waste based on product knowledge. Mr. Rochester said that he was not sure how much scrap plastic the facility generates. He said it is baled and sold to a variety of brokers for recycling, based on the highest bid. I observed scrap plastic in containers throughout the facility.

General trash is generated during facility maintenance and manufacturing and during removal of CRTs from televisions and computer monitors. The facility has determined that general trash is nonhazardous, based on product and process knowledge. General trash includes, but is not limited to, floor sweepings, paper, cardboard packaging, and wood paneling. Mr. Rochester said that he was not sure how much general trash the facility generates. General trash is collected by Gill Hauling and taken to the Sioux City Landfill in Sioux City, Iowa, for disposal or recycling.

4. Other Observations

During my visual inspection, I observed containers of electronic equipment awaiting processing (see Attachment 8, Photographs 7 through 14). I observed broken plastic and metal scrap outside the building on the concrete pad and on the unpaved ground (see Attachment 8, Photographs 15 through 18). I did not observe any pieces of leaded glass or broken CRTs in this area. However, because the containers were being stored outside and because some nonhazardous parts had been broken, I concluded that the facility had failed to manage the facility to minimize the possibility of a release, as required by 40 CFR 262.34(a)(4) referencing 265.31 (**NOPF No. 1**). Because the facility would be an LQG if it fails to demonstrate that leaded glass debris is not speculatively accumulated, I made this finding under the requirements for an LQG. I provided compliance assistance regarding management of raw materials.

5. Summary of Preliminary Findings

In summary, as part of the CEI, I found that the facility had failed to manage the facility to minimize possibility of a release, as required by 40 CFR 262.34(a)(4) referencing 265.31 (**NOPF No. 1**). Other than items specifically noted in the narrative, I observed no additional issues. However, further review by EPA may change or add to my findings.

Heather K. Wood
Geologist
Tetra Tech EM Inc.
Date: 7/24/15

Attachments:

1. Multimedia Screening Checklist (Two Pages)
2. RCRA Info Data Verification Handler Information Report (One Page)
3. Data Gathering Worksheets and Checklists (12 Pages)
4. Receipt For Documents And Samples (One Page)
5. Confidentiality Notice (One Page)
6. Notice of Preliminary Findings (One Page)
7. Aerial Photograph of Facility (One Page)
8. Photographic Documentation (19 Pages)
9. Emails from Facility (Two Pages)
10. Documentation from TDA (11 Pages)
11. Analysis of Unleaded Glass (14 Pages)

Forward To: EJ ☐ EPCRA / RMP / TSCA ☑ CWA ☑ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☐ RCRA ☑ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: RECYCLETRONICS
Facility Ownership: BAINTREE PROPERTIES
Street: 3313 NORTHBROOK DR
City: SIOUX CITY State: IA Zip: 51105
Phone: 712-224-3158 Facility Contact: AARON ROCHESTER
Number of Employees: 7 Work Hours/Shifts 7:30-5:30 T-F

Inspector HEATHER WOOD
Primary Media: RCRA
Inspector Phone Ext.: 816-412-1787
Date: 6/16/15
SIC/NAICS Code 562920

Facility Subject to OSHA regulations Yes ☑ No ☐

Main facility activity, major process chemical(s) & description: PROCESSING COMPUTER MONITORS, INCLUDING CRT — PROCESSING CRTs BY REMOVING LEADED GLASS

(**Check all that apply**): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐ , formulating ☐, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☐), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐ , other_____).

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☑ (stop) Yes ☐
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☐ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☐ No ☑ ***Forward to EPCRA***
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☑ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☑
4. Does the facility have any oil filled electrical equipment No ☑ (stop) Yes ☐ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – ***Get Photo***

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☑ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☑ (stop) Yes ☐
   If yes, are the discharges permitted by: State? ☐ , City? ☐ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☐ (stop) Yes ☑
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☑ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☑ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☑ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
   No ☐ (stop) Yes ☐ - Identify location and timeframe_____ (***Get Photo***) ***FWD to Wetlands***

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☑ (stop) Yes ☐ ***Forward to UIC***
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☑ (stop) Yes ☐ ***Forward to PWS***
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☑ Yes ☐ ***Forward to CAA***
   Source_____ (*Get Photo*)
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☑ (stop) Yes ☐
   If yes, is equipment permitted? Yes ☐ No ☐ ***Forward to CAA*** *Describe:*_____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☑ (stop) Yes ☐ ***Forward to CFC***
   If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company:_____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☑ (stop) Yes ☐ ***Forward to EPCRA/RMP***
5. Does the facility service motor vehicle air conditioning systems? No ☑ (stop) Yes ☐ ***Forward to CFC***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☑ (stop) Yes ☐
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ ***Forward to RCRA***
2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☑ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***
3. Did you see or does the facility have any large quantities of materials **that the facility claims to be non-hazardous waste material** (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☑

Material Claimed To Be Non-Hazardous	**How does the facility know these wastes are non-hazardous?**
LEADED GLASS	Testing, industry or manuf. info.., MSDS, etc. ☑; None available ☐ ***Forward to RCRA***
UNLEADED GLASS	Testing, industry or manuf. info.., MSDS, etc. ☑; None available ☐ ***Forward to RCRA***
SCRAP METAL	Testing, industry or manuf. info.., MSDS, etc. ☑; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☑ Yes ☐ ***Forward to RCRA***
   Describe:_____ (*Get Photo*)
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☑ Yes ☑ ***Forward to RCRA***
   Describe: ~~BROKEN~~ (HW) (HW) (*Get Photo*)
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☐ Yes ☑ ***Forward to RCRA &***
   EPCRA Describe: ELECTRONIC EQUIPMENT STORED OUTSIDE (*Get Photo*)
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☑ Yes ☐ ***Forward to UST***
8. Does the facility have any underground fuel tanks for emergency generators? No ☑ Yes ☐ ***Forward to UST***

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☑ (stop) Yes ☐ - Does the facility have a certified SPCC Plan? Yes ☐ No ☐ ***Forward to SPCC***
   If yes, are there secondary containment systems for the tanks? Yes ☐ No ☐ ***Forward to SPCC***
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ (*Get Photo*) ***Forward to SPCC***

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☑ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☑ Yes ☐

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

GRAY SHADED AREAS INDICATE ITEMS **YOU** NEED TO **LOOK** FOR DURING VISUAL INSPECTION

HANDLER INFORMATION REPORT

April 2, 2015

Procedures for Inspectors/Investigators/etc. performing Site Visits

Present the Facility representative with a copy of their:

- Handler Information Report (attached)
- Copy of the current Notification Form (attached)
- Copy of the current Notification Booklet (attached)

Our instructions to them are printed on their Handler Information Report - and should be self explanatory. If the facility wants to revise their Handler Information Report, they can do so and mail it back to EPA - or have the inspector deliver it.

If during the course of the site visit, the inspector/investigator becomes aware of any changes which should be made to the information printed on this form, please make the corrections and return the form to: Beth Koesterer, AWMD/WEMM.

EPA RCRA ID Number: [redacted] - ADMINISTRATIVE ID NUMBER - DO NOT RELEASE

Exemption 2

Name of Company/Site: RECYCLETRONICS - ADMINISTRATIVE ID# - DO NOT RELEASE
Location of Site: 3313 NORTHBROOK DR
SIOUX CITY, IA 51105
WOODBURY County

Land Type: Private

NAICS: 562920

Mailing Address: 3313 NORTHBROOK DR
SIOUX CITY IA 51105

Site Contact: AARON ROCHESTER
Job Title: OWNER
Address: 3313 NORTHBROOK DR
SIOUX CITY IA 51105
Phone Number: 712-224-3158
Email: RECYCLETRONICSGM@CABLEONE.COM

Current Owner of Site: ~~AARON ROCHESTER~~ RAINTREE PROPERTIES
Phone Number: ~~712-224-3158~~ UNKNOWN
Owner Type: Private

Current Operator of Site: RECYCLETRONICS
Address: 3313 NORTHBROOK DR
SIOUX CITY IA 51105

Operator Type: PRIVATE
Date Became Operator: 2013

TYPE(S) OF REGULATED ACTIVITY: None

Hazardous Wastes Handled: N/A

Attachment 2 Page 1 of 1

Date of Site Visit: 6/16/15

Name of Inspector (Please print): HEATHER K. WOOD

(Check one): ❑ EPA R7 ENSV ☑ EPA R7 Contractor ❑ NOWCC/SEE Investigator

Signature of Inspector: [signature]

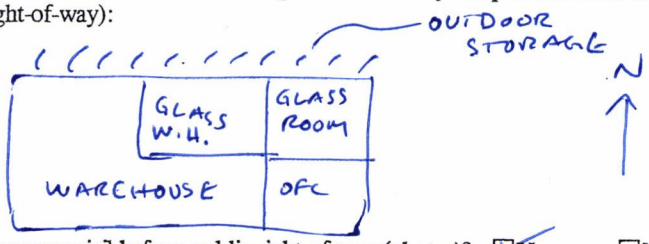
Appendix 1-3

Facility: RECYCLETRONICS Date: 6/16/15 Arrival time: 9:30

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☑Yes ☐No

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☑Yes ☐No

- Containers	- Tanks	- Processing Equipment	- Loading Areas
- Unloading Areas	- Security Devices	- Open Drums	- Stressed Vegetation
-Unusual Staining	- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns		

Appendix 1-4

SITE ENTRY AND INBRIEFING

1. ☑Used main entrance ☑Entered during normal operating hours ☐Excessive delays (>15 minutes - denial of access?) - ☑No

2. Facility Representative(s): AARON ROCHESTER Title: OWNER/PRESIDENT

_____ Title: _____

_____ Title: _____

3. Does representative have intimate knowledge of all waste management practices? ☑Yes ☐No

How long in position? ~5 YRS

4. Introduction:

- ☑Presented credentials
- ☑Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☑Verified presence at correct facility (checked address/I.D. #)
- ☑Explained authority to conduct inspection (Section 3007 of RCRA)
- ☑Explained the purpose, scope, and order of the inspection
- ☑Completed Multimedia screening checklist
- ☑Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☑Provided SBRFA
- ☐Obtained GPS reading
- ☑Explained facility's right to claim CBI

5. Was full access granted? ☑Yes ☑ By facility representative or Other (name): N/A

☐No - Access denied. Name of person denying access: N/A

Time of denial: N/A

Reason for denial, or limitations placed on access:

N/A

Appendix 1-5 FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: 2013 Number of employees: 7

Number of shifts/hour worked: 7:30a - 5:30p Number of days worked per week: T - FR

Size (sq. ft., how divided): ~18,000 ft² BLDG

Property owner and facility operator the same? ☐ Yes ☑ No

OWNED BY RAINTREE PROPERTIES

2. Major products or services provided: PROCESSING CRTs FOR RECYCLING — PASS-THROUGH FOR OTHER EWASTE

3. Major raw materials used: N/A — ALL PROCESSES MANUAL

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
~~RECYCLING CRTs~~ (ITW)	
PROCESSING CRTs FOR RECYCLING	LEADED GLASS DEBRIS
	UNLEADED GLASS DEBRIS
	SCRAP METAL
	SCRAP PLASTIC
	GENERAL TRASH
BLDG MAINT.	GENERAL TRASH

5. Complete a Generator Waste Stream Worksheet and /or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☐Yes ☐No

N/A – NON-NOTIFIER

7. **GENERATOR STATUS:** (based on records review)

☑Non-generator
☐CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☐SQG (100-1000kg/mo and accumulate <6000kg)
☐LQG (>1000kg/mo)

Is facility's status solidly within above category? ☐Yes ☑No
(If not carefully verify status and document)

UNABLE TO VERIFY THAT THE FACILITY IS NOT SPECULATIVELY ACCUMULATING LEADED GLASS. IF IT IS, EXEMPTION WOULD NOT APPLY ⇒ LQG

8. **TSD STATUS:** ☐Treatment ☐Storage ☐Disposal

Note: Types of units, number of units, capacities, processes, etc:

N/A

9. Resolved questions from Pre-Inspection Worksheet? ☑Yes ☐No ☐No Questions

FACILITY IS NOT EXPORTING DIRECTLY. LEADED GLASS IS SENT TO COMPANY IN CALIFORNIA. THAT COMPANY EXPORTS TO A SISTER COMPANY IN MEXICO.

10. Resolved compliance officer's questions from Pre-Inspection Worksheet? ☑Yes ☐No ☐No Questions

SEE ABOVE

11. Requested site map or diagram to identify all observations? ☐Yes ☑None Available

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

1. WASTE STREAM: LEADED GLASS DEBRIS

FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☑Not done ☐Inadequate

WASTE CODES: N/A

DETERMINATION METHOD: ☑Product knowledge ☑Process knowledge ☐Testing

Documentation: EXEMPT — RECYCLED AND NOT EXPORTED

GENERATING PROCESS: BREAKING DOWN CRTs

GENERATION RATE: UNKNOWN — DOCUMENTS ON CRASHED COMPUTER

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☑Visually inspected

~~~100 ~~250~~~ (HW) 1-CY CONTAINERS ON SITE

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY TECHNOLOGIES DISPLAYS AMERICAS — THEY THEN TRANSPORT TO SISTER CO. IN MEXICO PREVIOUSLY — CLOSED LOOP ~~RECYCLING~~ REFINING IN PHOENIX AZ — DOE RUN IN VIBURNUM MO

2. WASTE STREAM: UNLEADED GLASS DEBRIS

FACILITY DETERMINATION: ☐Hazardous ☑Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: N/A

DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☑Testing

Documentation: TCLP TEST FOR METALS

GENERATING PROCESS: BREAKING DOWN CRTS

GENERATION RATE: 24 CUBIC YARDS/MO

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☑Visually inspected

CUBIC YARD CONTAINERS IN WAREHOUSE

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY GILL HAULING OF SIOUX CITY → AGGREGATE + FILL

KUUSAKOSKI RECYCLING IN PEORIA IL IS IN NEGOTIATION

3. WASTE STREAM: SCRAP METAL

FACILITY DETERMINATION: ☐Hazardous ☑Non-hazardous ☐Not done ☐Inadequate

WASTE CODES: ~~EXEMPT — RECYCLED~~ N/A N/A

DETERMINATION METHOD: ☑Product knowledge ☑Process knowledge ☐Testing

Documentation: EXEMPT — RECYCLED

GENERATING PROCESS: BREAKING DOWN CRTS

GENERATION RATE: 20 CY/DAY

ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☑Visually inspected

ROLLOFF CONTAINER

OFF-SITE MANAGEMENT/DISPOSITION: COLLECTED BY COMPRESSED STEEL OF SIOUX CITY FOR RECYCLING
~~~

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET**

4 1. **WASTE STREAM:** SCRAP PLASTIC

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing

Documentation: PLASTIC CODES

GENERATING PROCESS: PROCESSING CRTs

GENERATION RATE: UNKNOWN

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

NONE STORED

OFF-SITE MANAGEMENT / DISPOSITION: BALED AND SOLD TO BROKERS FOR RECYCLING

5 2. **WASTE STREAM:** GENERAL TRASH

FACILITY DETERMINATION: ☐ Hazardous ☑ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES: N/A

DETERMINATION METHOD: ☑ product knowledge ☑ process knowledge ☐ testing

Documentation: N/A

GENERATING PROCESS: BUILDING MAINT + PROCESSING CRTs

GENERATION RATE: UNKNOWN

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☑ visually inspected

ROLLOFF

OFF-SITE MANAGEMENT / DISPOSITION: COLLECTED BY GILL HAULING → SIOUX CITY LANDFILL

6 3. **WASTE STREAM:**

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES:

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing

Documentation:

GENERATING PROCESS:

GENERATION RATE:

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

OFF-SITE MANAGEMENT / DISPOSITION:

N/A

Appendix 1-6 **GENERATOR WASTE STREAM WORKSHEET** N/A

1. WASTE STREAM: _____

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

_____

_____

OFF-SITE MANAGEMENT / DISPOSITION: _____

_____

_____

2. WASTE STREAM: _____

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

_____

_____

OFF-SITE MANAGEMENT / DISPOSITION: _____

_____

_____

3. WASTE STREAM: _____

FACILITY DETERMINATION: ☐ Hazardous ☐ Nonhazardous ☐ Not done ☐ Inadequate

WASTE CODES: _____

DETERMINATION METHOD: ☐ product knowledge ☐ process knowledge ☐ testing

Documentation: _____

GENERATING PROCESS: _____

GENERATION RATE: _____

ON-SITE MANAGEMENT: satellites ☐ visually inspected storage ☐ visually inspected

_____

_____

OFF-SITE MANAGEMENT / DISPOSITION: _____

_____

_____

N/A

D. PERSONNEL TRAINING

(SQG – 262.34(d)(5)(iii), LQG's – 262.34(a)(4) referencing 265.16, I.S.-265.16 only)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Program director trained in hazardous waste management procedures (LQG only)→265.16(a)(2)	
2.		Employees do not work unsupervised without completing training & are trained within 6 mo. of initial hiring (LQG only)→265.16(b)	
3.		Employees are trained annually (LQG only)→265.16(c)	
4.		Job title & name of person filling position specified (LQG only)→265.16(d)(1)	
5.		Written job description including: skills, education or qualification, and duties (LQG only)→265.16(d)(2)	
6.		Written description of type and amount of introductory & continuing training provided (LQG only)→265.16(d)(3)	
7.		Training covers: response to emergencies, implementation of contingency plan, use of alarms, waste feed cut-offs & other emergency equipment, as required (LQG only)→265.16(a)(3)	
8.		Documentation confirming training has been completed (LQG only)→265.16(d)(4)	
9.		Records maintained on-site for current employees & for 3 years for former employees→265.16(d) & (e) respectively	
10.		All employees are familiar with waste handling and emergency procedures relevant to their responsibilities (SQG only)→262.34(d)(5)(iii)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

11. Notes/Observations: _____

E. WASTE ANALYSIS/WASTE DETERMINATION AND LAND DISPOSAL RESTRICTIONS

1. Location of waste analysis/waste determination records: OFFICE

2. Person responsible for waste analysis/waste determination: AARON ROCHESTER

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
3.	✓	Determines if waste is a hazardous waste-262.11	
4.	✓	Determines if waste is restricted from land disposal-262.11(d)→268.7(a)(1)	
5.	N/A	Determines waste does not meet applicable treatment standards (ATS)-268.7(a)(2)	
a.		One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(2)	
b.		SQG disposes of waste under a contractual or tolling agreement-268.7(a)(10). (LDR Notice available for the initial shipment and copy of LDR Notice kept for 3 years after termination of agreement)	
6.		Waste covered by a National Capacity Variance(s)-268 Subpart C, Extension, or Petition-268.5 & 6. (Describe the variance, extension, or petition that applies)	
a.		Provides a notice to the land disposal facility with the initial shipment, or a revised notice if changes occur, stating that the waste is exempt from the LDRs-268.7(a)(4).	
7.		Ships waste(s) covered by the LDRs off-site for treatment or disposal-268.7(a)(2). If no, go to 8.	
a.		Provides a notice with initial shipment, or new notification, if changes occur-268.7(a)(2)	
b.		Notice includes: EPA hazardous waste number(s), manifest number(s), waste analysis data, if available, and waste constituents, wastewater or non-wastewater classification, and subcategory, if applicable-268.7(a)(2)→268.7(a)(4)	
8.	N/A	Determined waste to be excluded from the definition of hazardous or solid waste, or exempt from Subtitle C regulations under 261.2 thru 261.6 subsequent to the point of generation-268.7(a)(7)	
a.		Retains a one-time notice describing the generation, subsequent exclusion or exemption, and the disposition of the waste, in the facility's on-site files-268.7(a)(7). (If soil contaminated with waste, a special certification statement is included with the notice-268.7(a)(2)(i))	
9.		Determines waste or soil contaminated with waste does meet the ATS or does not exceed prohibition levels and requires no further treatment-268.7(a)(3)	
a.		One time written notice submitted to treatment or storage facility with initial shipment and a copy placed in file-268.7(a)(3)(i)	
10.		Additional special rules regarding waste that exhibits a characteristic-268.9	

a.	N/A	If not D001 non-wastewater, determines the underlying constituents as defined in 268.2(i)-268.9(a)	
b.		If land disposed, waste meets the treatment standards specified in 268 Subpart D-268.9(c)	
c.		First claims that their characteristic waste is no longer hazardous-sends a one-time notification and certification to EPA or authorized State, places a copy in the file, and updates both if there are changes in process, operation or receiving facility-268.9(d)	
11.	✓	Impermissible dilution of waste to meet LDR standards in not occurring-268.3(a) & (b)	
12.	N/A	If hazardous waste prohibited from land disposal is either: a contaminated soil, or is a contaminated soil which is treated, or a lab pack waste, or hazardous waste debris, or managed at a treatment or disposal facility, or the generator's determination is based solely on knowledge – See additional LDR checklists in Appendix 2-1	
13.		References to Waste Specific Prohibitions under Subpart C: - Wood Preserving Wastes – 268.30 - Dioxin-containing Wastes – 268.31 - TC Metal Wastes – 268.34 - Petroleum Refining Wastes – 268.35 - Ignitable and Corrosive Characteristic Wastes Whose Treatment Standards Were Vacated – 268.37 - Newly Identified Organic Toxicity Characteristic Wastes and Newly Listed Coke By-Product and Chlorotoluene Production Wastes – 268.38 - Spent Aluminum Pot Liners; Reactive; and Carbamate Wastes – 268.39	
14.		Prohibition on Storage of Restricted Waste-268.50	
15.		Reminder – Treatment Standards listed in 268.41 through 268.49	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

16. Notes/Observations: N/A

N/A

F. OPERATING RECORD (SQG – N/A, LQG's – N/A)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Written operation record maintained on-site, and until closure-265.73(a) & (b) respectively	
2.		Description of quantity (estimated weight or volume & density), method(s) and date(s) of treatment, storage, or disposal, including: name & EPA waste code(s), physical form, process which produced waste, & handling codes-265.73(b)(1)	
3.		Location and quantity of each hazardous waste at facility cross-referenced to the specific manifest-265.73(b)(2)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

G. INSPECTIONS (SQG – N/A, LQG's – N/A)

#	√ / x	REGULATORY REQUIREMENTS*	COMMENTS
1.		Facility is inspected for malfunctions and discharges which may lead to a release or human threat-265.15(a)	
2.		Written schedule for inspecting & monitoring safety, emergency, security, operating & structural equipment-265.15(b)(1)	
3.		Schedule maintained at facility-265.15(b)(2)	
4.		Schedule identifies all types of problems looked for and frequency of inspections-265.15(b)(3-4)	
5.		Areas subject to spills, such as loading/unloading areas, are inspected daily when in use-265.15(b)(4)	
6.		Facility remedies all problems found-265.15(c)	
7.		Inspection records identify the name of inspector, the date & time of inspection, & the date and nature of repairs-265.15(d)	
8.		Inspection records maintained for 3 years-265.15(d)	

√ - in compliance X – not in compliance N/A – not applicable * - please note applicable permit requirements

N/A

Tank #2 – Name & location of tank:_____

Person responsible for tank area:_____

Age of tank when it first stored/treated/held a hazardous waste:_____

How was age verified?_____

Tank design capacity:_____ Type of waste in tank:_____

Volume currently in the tank:_____ How was volume verified?_____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers:_____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #3 – Name & location of tank:_____

Person responsible for tank area:_____

Age of tank when it first stored/treated/held a hazardous waste:_____

How was age verified?_____

Tank design capacity:_____ Type of waste in tank:_____

Volume currently in the tank:_____ How was volume verified?_____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers:_____

Area noted on map or diagram: ☐ YES ☐ NO

Tank #4 – Name & location of tank:_____

Person responsible for tank area:_____

Age of tank when it first stored/treated/held a hazardous waste:_____

How was age verified?_____

Tank design capacity:_____ Type of waste in tank:_____

Volume currently in the tank:_____ How was volume verified?_____

Length of time in tank: ☐ <90 day ☐ <180 day ☐ <270 day ☐ I.S. ☐ Permit

Photos taken? ☐ YES ☐ NO Photo numbers:_____

Area noted on map or diagram: ☐ YES ☐ NO

Appendix 1-10

EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☑ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
   - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

☑ Identified/verified violations from previous inspection were corrected (if applicable)
☑ Addressed all unresolved inspection related issues
☑ Summarized findings and observations for the facility representatives
~~NOV~~ NOPE issued? ☑ Yes ☐ No ☑ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☑ Explained the importance of a timely (14 day) and adequate response
☑ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☑ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
☑ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☑ Provided facility with CBI form
☑ Prepared Document Receipt form

3. Specific information requested from facility? ☑ Yes ☐ No

DOCUMENTATION OF INPUT + OUTPUT

4. Facility appears to have awareness of RCRA regulations? ☐ Yes ☑ No

5. Facility has its own environmental staff? ☐ Yes ☑ No

6. Facility has copy of applicable regulations? ☐ Yes ☑ No

7. Attitude and demeanor of facility representative(s); ☑ OK ☐ Not OK

8. Notes/Observations:

PER ROCHESTER, COMPUTER WITH INTAKE + RECYCLING RECORDS (NEEDED TO DETERMINE SPECULATIVE ACCUMULATION) WERE ON A CRASHED COMPUTER

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
RECYCLETRONICS
Facility Address
3313 NORTHBROOK DR SIOUX CITY IA 51105

Documents Collected? YES ✓ (list below) NO___

Samples Collected? YES___ (list below) NO ✓ Split Samples: YES___ NO___

Documents/Samples were: 1)Received no charge ✓ 2)Borrowed___ 3)Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

1) TCLP ON UNLEADED GLASS (14 PAGES)
2) DOCUMENTS FROM TDA (11 PAGES)

Facility Representative (print)	Signature/Date
Aaron Rochester	6/16/15
Inspector (print)	Signature/Date
HEATHER K. WOOD	6/16/15
U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101	

(rev:1/20/93)

Attachment 4 Page 1 of 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name	
RECYCLETRONICS	
Facility Address	
3313 NORTHBROOK DRIVE SIOUX CITY IA 51105	
Inspector (print)	
HEATHER WOOD	6/16/15
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date
Aaron J. Rochester	6/16/15

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

Attachment 5 Page 1 of 1

(Rev: 11/15/99)

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: RECYCLETRONICS
ADDRESS: 3313 NORTHBROOK DR
SIOUX CITY IA 51105
EPA ID NUMBER: NON NOTIFIER **DATE:** 6/16/15

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. ~~FAILURE TO MAKE A WASTE DETERMINATION ON LEADED GLASS (40 CFR 262.11)~~ (HW)
2. FAILURE TO OPERATE THE FACILITY TO MINIMIZE POSSIBILITY OF A RELEASE (40 CFR 262.34(a)(4) → 265.31)
3.
4.
5.
6.
7.

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Aaron Rochester **TITLE:** President

SIGNATURE:

This document was prepared by HEATHER WOOD

Attachment 7 Page 1 of 1

PHOTO LOG

Facility Name / City: Recycletronics
3313 Northbrook Drive
Sioux City, Iowa

Facility ID #: non-notifier
Date: June 16, 2015
Photographer: Heather K. Wood
Type of Camera: iPhone 4S.
Digital Recording Media: Flashcard
All digital photos were copied by: Heather Wood on June 16, 2015.
All digital photos were copied to: Tetra Tech, Inc. laptop computer
Original copy is stored in: Tetra Tech, Inc.'s internal office server. Digital photos were downloaded to server by Heather Wood. No changes were made in the original image files prior to storage on the server.

Photo #	Photo-grapher	Date	Approx. Time	File Name	Description
1	Heather Wood	6/16/15	1353	Recyc_001.jpg	This photograph shows the building, looking northwest.
2	Heather Wood	6/16/15	1353	Recyc_002.jpg	This photograph shows the building, looking north.
3	Heather Wood	6/16/15	956	Recyc_003.jpg	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.
4	Heather Wood	6/16/15	957	Recyc_004.jpg	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.
5	Heather Wood	6/16/15	957	Recyc_005.jpg	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.
6	Heather Wood	6/16/15	958	Recyc_006.jpg	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.
7	Heather Wood	6/16/15	1000	Recyc_007.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
8	Heather Wood	6/16/15	1003	Recyc_008.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
9	Heather Wood	6/16/15	1357	Recyc_009.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
10	Heather Wood	6/16/15	1001	Recyc_010.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
11	Heather Wood	6/16/15	1001	Recyc_011.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
12	Heather Wood	6/16/15	1002	Recyc_012.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
13	Heather Wood	6/16/15	1357	Recyc_013.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.

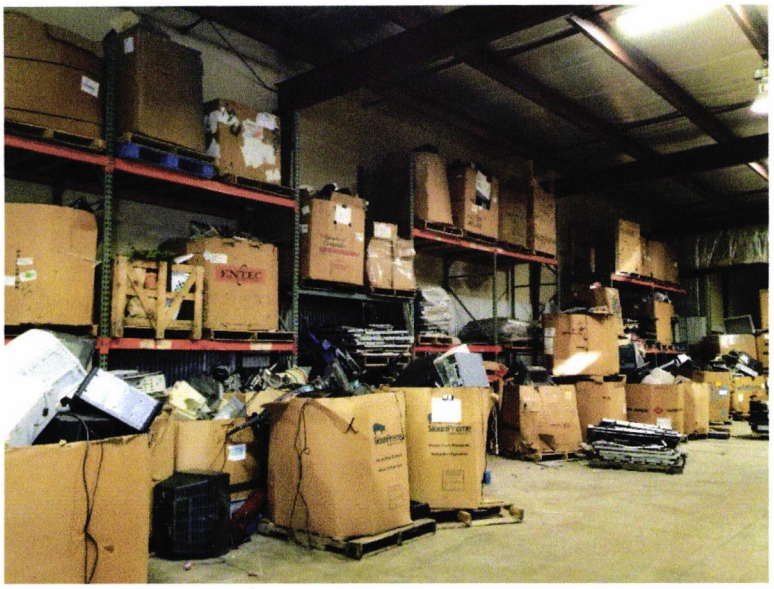
Photo #	Photo-grapher	Date	Approx. Time	File Name	Description
14	Heather Wood	6/16/15	1358	Recyc_014.jpg	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.
15	Heather Wood	6/16/15	1003	Recyc_015.jpg	This photograph shows plastic and metal debris on the ground outside the warehouse (**NOPF No. 1**).
16	Heather Wood	6/16/15	1003	Recyc_016.jpg	This photograph shows plastic and metal debris on the ground outside the warehouse (**NOPF No. 1**).
17	Heather Wood	6/16/15	1004	Recyc_017.jpg	This photograph shows plastic and metal debris on the concrete pad outside the warehouse (**NOPF No. 1**).
18	Heather Wood	6/16/15	1358	Recyc_018.jpg	This photograph shows plastic and metal debris on the ground and the concrete pad outside the warehouse (**NOPF No. 1**).
19	Heather Wood	6/16/15	1010	Recyc_019.jpg	This photograph shows the glass room, where leaded and unleaded glass cathode ray tube (CRT) components are separated.
20	Heather Wood	6/16/15	959	Recyc_020.jpg	This photograph shows a piece of glass processing equipment, no longer in use, and containers of leaded glass in the warehouse.
21	Heather Wood	6/16/15	959	Recyc_021.jpg	This photograph shows containers of leaded glass in the warehouse.
22	Heather Wood	6/16/15	1004	Recyc_022.jpg	This photograph shows containers of leaded glass in the warehouse.
23	Heather Wood	6/16/15	1005	Recyc_023.jpg	This photograph shows containers of leaded glass in the warehouse.
24	Heather Wood	6/16/15	1007	Recyc_024.jpg	This photograph shows containers of leaded glass in the warehouse.
25	Heather Wood	6/16/15	1007	Recyc_025.jpg	This photograph shows containers of leaded glass in the warehouse.
26	Heather Wood	6/16/15	1007	Recyc_026.jpg	This photograph shows containers of leaded glass in the warehouse.
27	Heather Wood	6/16/15	1008	Recyc_027.jpg	This photograph shows containers of leaded glass in the warehouse. The inset shows a typical label, observed on approximately 25% of the containers.
28	Heather Wood	6/16/15	1011	Recyc_028.jpg	This photograph shows containers of leaded glass in the glass room.
29	Heather Wood	6/16/15	1012	Recyc_029.jpg	This photograph shows containers of leaded glass in the glass room.
30	Heather Wood	6/16/15	1006	Recyc_030.jpg	This photograph shows a damaged container of leaded glass in the warehouse.
31	Heather Wood	6/16/15	1006	Recyc_031.jpg	This photograph shows the contents of the container shown in Photograph 30.
32	Heather Wood	6/16/15	1015	Recyc_032.jpg	This photograph shows containers of unleaded glass awaiting collection in front of the warehouse.
33	Heather Wood	6/16/15	1016	Recyc_033.jpg	This photograph shows a rolloff container of scrap metal in front of the warehouse.

Recycletronics
Sioux City, Iowa

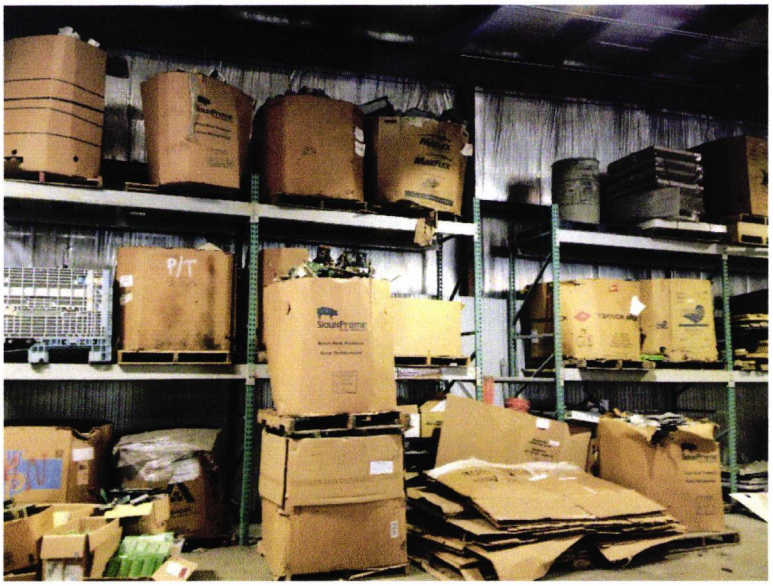
RCRA Enforcement and Permitting Assistance (REPA) Zone 3 Task Order 020	DESCRIPTION	This photograph shows the building, looking northwest.	1
	CLIENT	U.S. Environmental Protection Agency (EPA)	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows the building, looking north.	2
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.	3
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.	4
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

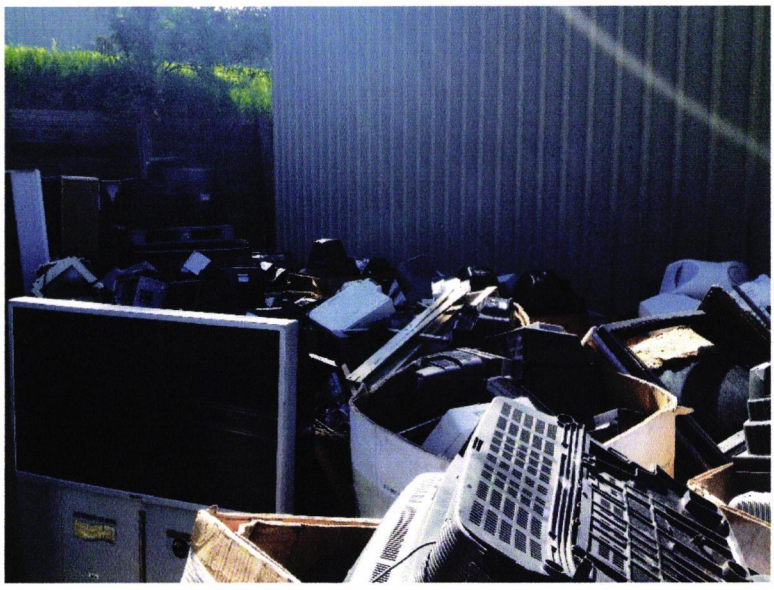
Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.	5
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment inside the warehouse awaiting sorting and processing.	6
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	7
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	8
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	9
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	10
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	11
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	12
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	13
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of electronic equipment outside the warehouse awaiting sorting and processing.	14
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows plastic and metal debris on the ground outside the warehouse (**NOPF No. 1**).	15
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows plastic and metal debris on the ground outside the warehouse (**NOPF No. 1**).	16
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

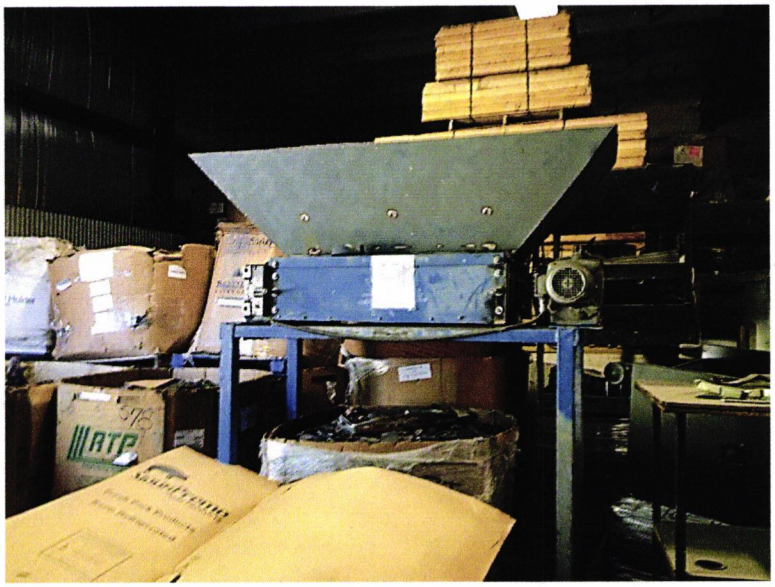
Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows plastic and metal debris on the concrete pad outside the warehouse (**NOPF No. 1**).	17
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows plastic and metal debris on the ground and the concrete pad outside the warehouse (**NOPF No. 1**).	18
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows the glass room, where leaded and unleaded glass cathode ray tube (CRT) components are separated.	19
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows a piece of glass processing equipment, no longer in use, and containers of leaded glass in the warehouse.	20
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	21
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	22
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	23
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

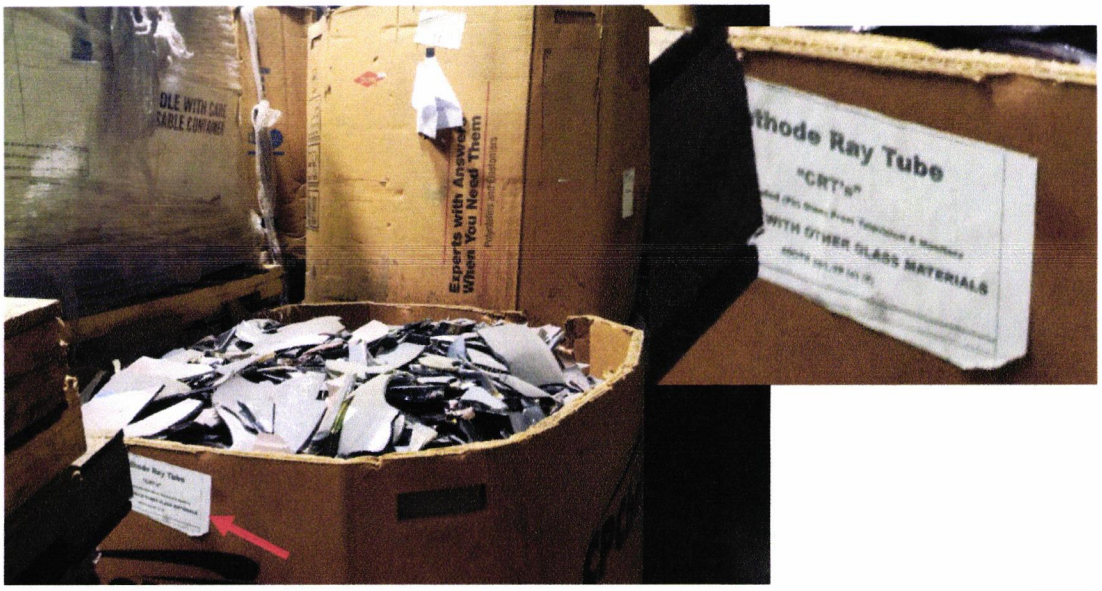
REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	24
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	25
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse.	26
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the warehouse. The inset shows a typical label, observed on approximately 25% of the containers.	27
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the glass room.	28
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of leaded glass in the glass room.	29
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows a damaged container of leaded glass in the warehouse.	30
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows the contents of the container shown in Photograph 30.	31
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows containers of unleaded glass awaiting collection in front of the warehouse.	32
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Recycletronics
Sioux City, Iowa

REPA Zone 3 Task Order 020	DESCRIPTION	This photograph shows a rolloff container of scrap metal in front of the warehouse.	33
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	

Wood, Heather

From: Aaron Rochester <recycletronicsgm@cableone.net>
Sent: Thursday, July 02, 2015 8:55 AM
To: Wood, Heather
Subject: Re: following up on input and output rates

Not yet , we are going to do carbonite next

From: "Heather Wood" <Heather.Wood@tetratech.com>
To: "Aaron Rochester" <recycletronicsgm@cableone.net>
Sent: Wednesday, July 1, 2015 11:48:25 AM
Subject: RE: following up on input and output rates

Any luck getting those documents?

From: Aaron Rochester [mailto:recycletronicsgm@cableone.net]
Sent: Friday, June 26, 2015 9:03 AM
To: Wood, Heather
Subject: Re: following up on input and output rates

I have been out of the office and we did not get our computer back, I will check back with CSI on monday and see if I can get you that info.

Respectfully,

Aaron J. Rochester

From: "Heather Wood" <Heather.Wood@tetratech.com>
To: recycletronicsgm@cableone.net
Sent: Tuesday, June 23, 2015 11:35:10 AM
Subject: following up on input and output rates

Mr. Rochester,

I wanted to follow up on the inspection I completed last week. You were going to provide me with documentation showing the amount of leaded glass you received in 2014 and the amount you sent for recycling in 2014. My report is due at EPA by July 7, so it would be best if I could get that information sometime this week if it's going to go into the report.

Thanks in advance, and let me know if you have any questions.

Heather K. Wood, RG, LEED AP
Tetra Tech | Complex World, Clear Solutions™

Direct: 303-312-8808 | Main: 303-312-8800 | Fax: 303-295-2818 | Cell: 816-517-7686
216 16th Street, Ste. 1500 | Denver, CO 80202

Direct: 816-412-1787 | Main: 816-412-1741 | Fax: 816-410-1748 | Cell: 816-517-7686
415 Oak Street | Kansas City, MO 64106

RECYCLETRONICS™
DISABLED VETS AT WORK

TO: TDA
1778 Carr Rd #4B
Calexico, CA 92231
MX C.P. 21384

Final Destination:
Calzada Robledo # 460 Desarrollo Industrial El Colorado, Mexicali, B.C.

Date: 7/2/2014
from: 3313 Northbrook Dr.
Sioux City, IA 51105 (712)-224-3158

Box #	Item	Gross	Tare	Net	
	lead glass	3,445	70.0	3375	
	lead glass	2810	70.0	2740	
	lead glass	2805	70.0	2735	*
	lead glass	2990	70.0	2920	*
	lead glass	3405	70.0	3335	*
	lead glass	3415	70.0	3345	*
	lead glass	2730	70.0	2660	
	lead glass	3717	70.0	3647	*
	lead glass	3350	70.0	3280	
	lead glass	3203	70.0	3133	
	lead glass	2575	70.0	2505	*
	lead glass	3023	70.0	2953	*
	lead glass	3250	70.0	3180	*
13 Total Boxes					
0		40718	910	39808	

Box #	Item	Gross	Tare	Net
#VALUE!				
0		0	0	0

Seal# 1728504

TOTALS:

13	Pallets
40718	Gross
910	Tare
39808	Net

Loader: Ever G Date: 7/2/14

UnLoad: _____ Date: _____

Driver: _____ Date: _____

RECYCLETRONICS™
DISABLED VETS AT WORK

to:

Date: 7/2/2014

from : 3313 Northbrook Dr.
Sioux City, IA 51105 (712)-224-3158

Box #	Item	Gross	Tare	Net	
	lead glass	3,445	70.0	3375	
	lead glass	2810	70.0	2740	
	lead glass	2805	70.0	2735	*
	lead glass	2990	70.0	2920	*
	lead glass	3405	70.0	3335	*
	lead glass	3415	70.0	3345	*
	lead glass	2730	70.0	2660	
	lead glass	3717	70.0	3647	*
	lead glass	3350	70.0	3280	
	lead glass	3203	70.0	3133	
	lead glass	2575	70.0	2505	*
	lead glass	3023	70.0	2953	*
	lead glass	4036	70.0	3966	*
	lead glass	3250	70.0	3180	
0		44754	980	43774	

Box #	Item	Gross	Tare	Net
#VALUE!				
0		0	0	0

Seal# 1728504

TOTALS:

0	Pallets
44754	Gross
980	Tare
43774	Net

Loader: Ever G **Date:** 7/2/14

UnLoad: _____ **Date:** _____

Driver: _____ **Date:** _____

Attachment 10 Page 2 of 11

CARGO INSPECTION RULES

INSPECTIONS

a. **Cargo Inspections need to check the following:**

   i. **Floor cleanliness**

      1. **Swept if needed by transport company**

         (*Please advise your transportation carriers of this*)

            a. **Clean up kit for carriers consist of hand held broom, small plastic liner bags, dust pan, disposable dust mask, spay water bottle, paper towels & disposable latex/non latex gloves**

      2. **Glass spillage: Glass returned to Gaylord is <u>not</u> allowed to be thrown in trash bins**

   ii. **Packaging needs to be appropriate and in compliance**

      1. **Labeled properly with "UNIVERSAL WASTE" &**

            a. **"CRT GLASS FOR RECYCLING"**

            b. **"CRT CATHODRAY TUBES"**

            c. **"TELEVISION SETS"**

      2. **We will add manifest labels**

   iii. **Packing list needs to be visible & available**

      1. **Specify the bundles and weight**

   iv. **Each load must have a copy of the following:**

      1. **BOL (Bill of Lading)**

      2. **MSDS (Material Safety Data Sheet)**

      3. **GWPS (Generator Waste Profile Sheet)**

      4. **AoC Letter (Acknowledgment of Consent)**

      5. **Any load which is found to have missing documents will be reported and <u>*not serviced*</u> until the documents are received by Cali Resources, Inc.**

         <u>Maria@caliresources.com</u> & <u>Betsy@caliresources.com</u>

a) **Packing list & BOL must be received as soon as it is generated and not less than 4 hours before arrival to Calexico (if it is not received, load will be re-scheduled without exceptions).**

b. **Any inspection load that needs to be re-worked will be processed after**

   i. **If the cargo needs to be re-worked because it is in unacceptable conditions we will proceed to make the proper adjustments prior to releasing cargo to CBP**

      1. **A Picture will be taken of the condition and sent to you prior to re-work for approval.**

c. **In order to inspect cargo properly:**

   i. **Double Stacked Cargo must be unloaded**

   ii. **Single Stacked Cargo may be inspected without unloading if auditor may board safely and without risk to injury. We are not responsible for any load not physically inspected at our facility and found with discrepancies at CBP**

TRANS-LOADING

The same inspection process above applies to trans-loaded cargo

NOTE: All drivers must be Hazmat Employee according to 49 CFR 172.704

I have read and understand the process for CALI/TDA cargo and agree to follow the outlined procedure:

Signature: _____ **Date:** 7/2/14

GENERATOR WASTE PROFILE SHEET

REQUESTED FACILITY: Recycletronics Disabled Vets at Work

I.- Generator Information:

Generator Name: Recycletronics Disabled Vets at Work
Generator Address: 3313 Northbrook Dr.
City: Sioux City State: Iowa Country: USA
Contact Name: Aaron Rochester
Phone #: 712-224-3158 Fax #: 7122243161

II.- Destination Facility Information:

Facility Name: TECHNOLOGIES DISPLAYS MEXICANA, S.A. DE C.V.
Facility Address: Calzada Robledo Industrial
City: Mexicali State: B.C. Country: MX

Contact Name: Albino Bessa
Phone #: 686-559-5100 Fax #:

III.- Waste Stream Information:

Name of Waste: (here goes the description of scrap/waste)
CRT Glass

Waste Classification: (Type of waste)
E Waste

Process Generating Waste:
Seperating CRT Glass

Method of shipment: Combo Boxes
Physical State: Iowa
Special Handling Instructions:
None

IV.- Physical Charactersitics of Waste:

_____ % by Weight (range)

V.- Generator Certification:

I hereby certify to the best of my knowledge that all information contained herein is true, complete and accurate.

Aaron Rochester President
Authorized Representative Name and Title

Authorized Representative Signature

Recycletronics Disabled Vets at Work
Company Name

7-2-14
Date

MATERIAL SAFETY DATA SHEET

SECTION I.

MANUFACTURERS NAME: TCE Corporation	EMERGENCY TELEPHONE NO.:
ADDRESS: New Holland Pike, Lancaster PA 17604-3140	(717) 295-6000
CHEMICAL NAME AND SYNONYMS: Leaded glass	TRADE NAME AND SYNONYMS: Leaded glass color picture tube funnels.
CHEMICAL FAMILY: Glass	FORMULA: Proprietary

SECTION II. HAZARDOUS INGREDIENTS

MATERIAL	APPROX. % BY WEIGHT	TLV
Lead	25 - 30	0.15 mg/m^3

SECTION III. PHYSICAL DATA

BOILING POINT (°C) : N/A	SPECIFIC GRAVITY (H_2O=1): 2.63 - 3.06
VAPOR PRESSURE (mm Hg): N/A	VOLATILE BY VOLUME (%): N/A
VAPOR DENSITY (AIR=1): N/A	EVAPORATION RATE (-1): N/A
SOLUBILITY IN WATER: Insoluble	APPEARANCE AND ODOR: Colorless, odorless

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: None	FLAMMABLE LIMITS: N/A
EXTINGUISHING MEDIA: N/A	
SPECIAL FIRE FIGHTING PROCEDURES: None	
UNUSUAL FIRE AND EXPLOSION HAZARDS: None	

SECTION V. HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE (TLV): The exposure limit for lead fumes given off at high temperatures is 0.05mg/m^3, with an "action level" of 0.03mg/m^3.
EFFECT OF OVEREXPOSURE: The fumes given off at high temperatures are capable of producing chronic effects such as cramps, fatigue, loss of appetite, diarrhea, anemia, and in severe cases central nervous system and kidney damage and possible adverse effects on the reproductive system.
EMERGENCY AND FIRST AID PROCEDURES: Eye Contact: Dust particles may produce mechanical irritation. Ingestion: Very unlikely and is not believed to represent a hazard. Inhalation: See above under EFFECT OF OVEREXPOSURE. Skin Contact: sharp edges of the glass may produce cuts.

SECTION VI. REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID - N/A
	STABLE	X	

INCOMPATIBILITY (Materials to avoid): Glass dissolves in hydrofluoric acid.
HAZARDOUS DECOMPOSITION PRODUCTS: Lead fumes are given off when glass is heated to high temperatures.

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID - N/A
	WILL NOT OCCUR	X	

SECTION VII. SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Use normal clean-up procedures using a broom or vacuum taking care to avoid excessive dusting.
WASTE DISPOSAL METHOD: Dispose in accordance with all applicable federal, state and local regulations.

SECTION VIII. SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION: Not required under normal industrial usage. If exposure may exceed permissible limits, use a NIOSH-approved respirator for toxic dusts having a TLV not less than 0.05mg/m^3.
VENTILATION: General room ventilation may be adequate, but air monitoring is recommended. If necessary, use local exhaust to keep exposure levels below permissible limits.
PROTECTIVE GLOVES: None.
EYE PROTECTION: Safety glasses.
OTHER PROTECTIVE EQUIPMENT: None.

SECTION IX. SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Avoid contact with sharp edges.
OTHER PRECAUTIONS: Air sampling of the work environment is recommended if operations involve heating of the glass to the softening point in a small or inadequately ventilated room.

Revision	Date	Subject	Code
01	25-JAN-94	Section format revised and installed on Interleaf System	9401-25-918
00	25-NOV-85		PCC86-66/904

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND COMPLIANCE
ASSURANCE

September 30, 2013

ALBINO F. BESSA
TECHNOLOGIES DISPLAYS AMERICAS LLC
1778 CARR ROAD SUITE 4B
CALEXICO, CA US 92231

EPA Notice ID: 007208/5E/13

Dear ALBINO F. BESSA:

Please find enclosed the Cathode Ray Tube (CRT) Acknowledgement of Consent (AOC) for TECHNOLOGIES DISPLAYS AMERICAS LLC, 1778 CARR ROAD SUITE 4B , CALEXICO, CA, UNITED STATES to export 108,000,000 Kilograms of CATHODE RAY TUBES undergoing recovery/recycling to foreign importer: to receiving facility: TECHNOLOGIES DISPLAYS MEXICANA SA DE CV, CALZADA ROBLEDO INDUSTIRIAL #460 DESARROLLO INDUSTRIAL EL COLORADO , MEXICALI BAJA CALIFORNIA, BCN MX This AOC letter is valid from September 23, 2013, to September 22, 2014.

The EPA Waste Import and Export Tracking System ID assigned to this notice is 007208/5E/13.

You will also find enclosed special instructions for the export of CRT's. If you have any questions regarding this correspondence, please contact Jana Tatum at telephone: , telefax: , or email: tatum.jana@epa.gov.

Sincerely,

Robert G. Heiss

Robert G. Heiss, Director
International Compliance Assurance Division
Office of Federal Activities

ACKNOWLEDGMENT OF CONSENT

September 30, 2013

COMPANY	QUANTITY
TECHNOLOGIES DISPLAYS AMERICAS LLC CALEXICO, CA 92231	**108,000,000 Kilograms**

This document will serve as the EPA Acknowledgment of Consent for **TECHNOLOGIES DISPLAYS AMERICAS LLC, CALEXICO, CA 92231** to export **108000000 Kilograms of CATHODE RAY TUBES** UNDERGOING RECOVERY/RECYCLING to **TECHNOLOGIES DISPLAYS MEXICANA SA DE CV, MEXICALI BAJA CALIFORNIA, BCN . This CONSENT is VALID for the period of September 23, 2013 through September 22, 2014.**

Please be advised that a copy of this ACKNOWLEDGEMENT OF CONSENT must accompany each shipment of used broken Cathode Ray Tubes undergoing recovery/recycling.

Please be advised of the following special RCRA requirements for export shipments of CRTs. These requirements are found at 40 C.F.R. Parts 261.

1. When the conditions specified on the original notification change, the exporter must provide EPA with a written renotification of the change, except for changes to the telephone number of the exporter and decreases in estimated quantity to be exported over the course of the 12 months. The shipment cannot take place until consent of the receiving country to changes has been obtained (except for changes to information about points of entry and departure and transit countries through which the CRTs shall pass) and the exporter of CRTs receives from EPA a copy of the Acknowledgment of Consent to Export CRTs reflecting the receiving country's consent to the changes. (§261.39(a)(5)(vi) and § 261.40)
2. A copy of the Acknowledgment of Consent to Export CRTs must accompany the shipment of CRTs. The shipment must conform to the Acknowledgment. (§261.39(a)(5)(vii) and § 261.40).
3. If the shipment of CRTs cannot be delivered for any reason to the recycler or alternate recycler, the exporter of CRTs must renotify EPA of a change in the conditions of the original notification to allow shipment to a new recycler and obtain another Acknowledgment of Consent to Export CRTs. (§261.39(a)(5)(viii) and § 261.40)
4. Exporters must keep copies of notifications and Acknowledgments of Consent to Export CRTs for a period of three years following receipt of the Acknowledgment. (§261.39(a)(5)(ix) and § 261.40)

Any questions you may have concerning this Acknowledgment of Consent or other export requirements may be directed to Jana Tatum, EPA, Office of Enforcement and Compliance Assurance, Office of Federal Activities, International Compliance Assurance Division (2254A), telephone number , fax number , tatum.jana@epa.gov.

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Cedar Falls Division
704 Enterprise Drive
Cedar Falls, IA

Phone: 319 - 277 - 2401 or 1 - 800 - 750 - 2401
Fax: 319 - 277 - 2425

Company: RecycleTronics
Send Report To: Aaron Rochester / RecycleTronics
Address: 301 West 7th Street
City/State/Zip Code: Sioux City, IA 51103
Telephone Number: 712-224-3158 Cell: 712-224-3160
Email Address for Reports to be sent: recycletronicsgm@cableone.net
Sampled By: (Print Name) Aaron Rochester
(Signature) Aaron J. Rochester

Your PO #:
Invoice To:
Quote #:
Project Name: Unleaded Glass
Project Number:
Project Manager:

Attachment 11 Page 1 of 1

Sample ID	Date Sampled	Time Sampled	# of containers shipped	Grab	Composite	Field Filtered	Preservative: Ice	HNO3 (Red & White Label)	HCl (Blue & White Label)	NaOH (Orange & White Label)	H2SO4 Plastic (Yellow & White Label)	H2SO4 Glass(Yellow & White Label)	None (Black & White Label)	Other (Specify)	Matrix: Groundwater	Wastewater	Drinking Water	Sludge	Soil	Waste	Analyze For: TCLP + 8 RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag)	pH	RUSH TAT (Must call ahead!)	Standard TAT	E-mail results	Fax Results
				X									X						X	X	X					

NOTICE: **Pre-Arrangements must be made *AT LEAST 48 Hours in ADVANCE* to receive results with these turn around time commitments; Additional Charges may be assessed.**

NOTES:

Relinquished by:	Date	Time	Received by:	Date	Time	Relinquished by:	Date	Time
Received for TestAmerica by:	Date	Time	COC Seals Present and Intact? Yes No	Laboratory Comments:				
Chad Carlson	9/29/10	9:24	Shipped via:					

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 ENTERPRISE DRIVE • CEDAR FALLS, IA 50613
800-750-2401 • 319-277-2425 FAX

Sample Receipt and Temperature Log Form

Client: Recycletronics Project: _____

City: _____

Date: 9-29-10 Receiver's Initials: CH Time (Delivered): 9:24

Temperature Record:

Cooler ID# (If Applicable)
CF

1.9 °C / On Ice

☑ Temp Blank

☐ Temperature out of compliance

Thermometer:

☐ IR - 61997671 'B'
☑ IR - 90876942 'C'
☐ IR - 61854108
☐ 22126775

Courier:

☐ UPS ☐ TA Courier
☑ FedEx ☐ TA Field Services
☐ FedEx Ground ☐ Client
☐ US Postal Service ☐ Other
☐ Spee-Dee _____

Custody seals present?
☑ Yes

Custody seals intact?
☑ Yes ☐ No

☐ Non-Conformance report started

Exceptions Noted

☐ Sample(s) not received in a cooler.
☐ Samples(s) received same day of sampling.
☐ Evidence of a chilling process
☐ Temperature not taken:
_____

***Refer to SOP CF-SS-01 for Temperature Criteria**

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

October 06, 2010

Client:
Recycletronics
301 West 7th Street
Sioux City, IA 51103

Attn: Aaron Rochester

Work Order: CTI1728
Project Name: TCLP
Project Number: Recyletronics

Date Received: 09/29/10

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-(800)750-2401

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
Unleaded Glass	CTI1728-01	09/28/10 11:40

Samples were received into laboratory at a temperature of 1.90 °C.

NELAC states that samples which require thermal preservation shall be considered acceptable if the arrival temperature is within 2 degrees C of the required temperature or the method specified range. For samples with a temperature requirement of 4 degrees C, an arrival temperature from 0 degrees C to 6 degrees C meets specifications. Samples that are delivered to the laboratory on the same day that they are collected may not meet these criteria. In these cases, the samples are considered acceptable if there is evidence that the chilling process has begun, such as arrival on ice.

Please refer to the Temperature and Sample Receipt form that is included with this report for additional information regarding the condition of samples at the time of receipt by the laboratory.

The reported results were obtained in compliance with the 2003 NELAC standards unless otherwise noted.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific sample analyzed.

Approved By:

Angela Muehling

TestAmerica Cedar Falls
Angela Muehling
Project Coordinator

Attachment 11 Page 3 of 14

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

Recycletronics
301 West 7th Street
Sioux City, IA 51103
Aaron Rochester

Work Order: CTI1728
Project: TCLP
Project Number: Recyletronics

Received: 09/29/10
Reported: 10/06/10 16:50

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	Quant Limit	Dilution Factor	Date Analyzed	Analyst	Reg. Limit	Method
Sample ID: CTI1728-01 (Unleaded Glass - Misc. Solid)					**Sampled: 09/28/10 11:40**			**Recvd: 09/29/10 09:24**	
General Chemistry Parameters									
pH	**10.4**	H3	pH Units	0.100	1	10/06/10 11:05	sas		SW 9045D
TCLP Metals									
Arsenic	<0.300		mg/L	0.300	1	10/02/10 03:16	cjt	5	SW 6010B
Barium	**6.54**		mg/L	0.100	1	10/02/10 03:16	cjt	100	SW 6010B
Cadmium	<0.0200		mg/L	0.0200	1	10/02/10 03:16	cjt	1	SW 6010B
Chromium	<0.0200		mg/L	0.0200	1	10/02/10 03:16	cjt	5	SW 6010B
Lead	**24.2**		mg/L	0.100	1	10/02/10 03:16	cjt	5	SW 6010B
Mercury	<0.00200		mg/L	0.00200	1	10/05/10 11:57	kmd	0.2	SW 7470A
Selenium	<0.150		mg/L	0.150	1	10/02/10 03:16	cjt	1	SW 6010B
Silver	<0.0200		mg/L	0.0200	1	10/02/10 03:16	cjt	5	SW 6010B
TCLP Extraction by EPA 1311									
TCLP Extraction Temp. Minimum	**21.3**		°C	NA	1	09/30/10 11:00	jdb		SW 1311
TCLP Extraction Temp. Maximum	**22.9**		°C	NA	1	09/30/10 11:00	jdb		SW 1311

Attachment 11 Page 4 of 14

TestAmerica Cedar Falls
Angela Muehling
Project Coordinator

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

Recycletronics
301 West 7th Street
Sioux City, IA 51103
Aaron Rochester

Work Order: CTI1728
Project: TCLP
Project Number: Recyletronics

Received: 09/29/10
Reported: 10/06/10 16:50

SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
TCLP Metals							
SW 6010B	10I1457	CTI1728-01	50.00	50.00	09/30/10 14:03	KMD	SW 3010A - TCLP
SW 7470A	10J0167	CTI1728-01	3.00	30.00	10/05/10 08:48	KMD	EPA 245.2/SW 7470

Attachment 11 Page 5 of 14

TestAmerica Cedar Falls
Angela Muehling
Project Coordinator

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

Recycletronics	Work Order:	CTI1728	Received: 09/29/10
301 West 7th Street			Reported: 10/06/10 16:50
Sioux City, IA 51103	Project:	TCLP	
Aaron Rochester	Project Number:	Recyletronics	

DATA QUALIFIERS AND DEFINITIONS

H3 Sample was received and analyzed past holding time.

ADDITIONAL COMMENTS

Attachment 11 Page 6 of 14

TestAmerica Cedar Falls
Angela Muehling
Project Coordinator

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Cedar Falls Division
704 Enterprise Drive
Cedar Falls, IA

Phone: 319 - 277 - 2401 or 1 - 800 - 750 - 2401
Fax: 319 - 277 - 2425

Company: RecycleTronics
Send Report To: Aaron Rochester / RecycleTronics
Address: 301 West 7th Street
City/State/Zip Code: Sioux City, IA 51103
Telephone Number: 712-224-3158 Cell: 712-224-3160
Email Address for Reports to be sent: recycletronicsgm@cableone.net
Sampled By: (Print Name) Aaron Rochester
(Signature) Aaron J. Rochester

Your PO #:
Invoice To:
Quote #:
Project Name: Unleaded Glass
Project Number:
Project Manager:

Attachment 11 Page 7 of 11

Sample ID	Date Sampled	Time Sampled	# of containers shipped	Grab	Composite	Field Filtered	Preservative: Ice	HNO3 (Red & White Label)	HCl (Blue & White Label)	NaOH (Orange & White Label)	H2SO4 Plastic (Yellow & White Label)	H2SO4 Glass(Yellow & White Label)	None (Black & White Label)	Other (Specify)	Matrix: Groundwater	Wastewater	Drinking Water	Sludge	Soil	Waste	Analyze For: TCLP + 8 RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag)	pH									RUSH TAT (Must call ahead!)	Standard TAT	E-mail results	Fax Results
				X									X						X	X	X											

NOTES:

NOTICE: **Pre-Arrangements must be made *AT LEAST 48 Hours in ADVANCE* to receive results with these turn around time commitments; Additional Charges may be assessed.**

Relinquished by:	Date	Time	Received by:	Date	Time	Relinquished by:	Date	Time
Received for TestAmerica by:	Date	Time	COC Seals Present and Intact? Yes No	Laboratory Comments:				
Chyl Carlson	9/29/10	9:24	Shipped via:					

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive • Cedar Falls, IA 50613
800-750-2401 • 319-277-2425 Fax

Sample Receipt and Temperature Log Form

Client: Recycletronics Project: _____

City: _____

Date: 9-29-10 Receiver's Initials: CH Time (Delivered): 9:24

Temperature Record:

Cooler ID# (If Applicable) CF

1.9 °C / On Ice

☑ Temp Blank

☐ Temperature out of compliance

Thermometer:

☐ IR - 61997671 'B'
☑ IR - 90876942 'C'
☐ IR - 61854108
☐ 22126775

Courier:

☐ UPS ☐ TA Courier
☑ FedEx ☐ TA Field Services
☐ FedEx Ground ☐ Client
☐ US Postal Service ☐ Other
☐ Spee-Dee _____

Custody seals present?
☑ Yes

Custody seals intact?
☑ Yes ☐ No

☐ Non-Conformance report started

Exceptions Noted

☐ Sample(s) not received in a cooler.
☐ Samples(s) received same day of sampling.
☐ Evidence of a chilling process
☐ Temperature not taken:
_____

***Refer to SOP CF-SS-01 for Temperature Criteria**

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

October 21, 2010

Client:
RECYCLETRONICS
301 West 7th Street
Sioux City, IA 51103

Attn: Aaron Rochester

Work Order: CTJ0745
Project Name: TCLP Metals Only
Project Number: Recycletronics

Date Received: 10/13/10

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-(800)750-2401

SAMPLE IDENTIFICATION	LAB NUMBER	COLLECTION DATE AND TIME
Unleaded Glass	CTJ0745-01	10/12/10 11:45

Samples were received into laboratory at a temperature of 0.20 °C.

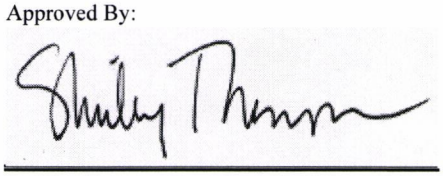
NELAC states that samples which require thermal preservation shall be considered acceptable if the arrival temperature is within 2 degrees C of the required temperature or the method specified range. For samples with a temperature requirement of 4 degrees C, an arrival temperature from 0 degrees C to 6 degrees C meets specifications. Samples that are delivered to the laboratory on the same day that they are collected may not meet these criteria. In these cases, the samples are considered acceptable if there is evidence that the chilling process has begun, such as arrival on ice.

Please refer to the Temperature and Sample Receipt form that is included with this report for additional information regarding the condition of samples at the time of receipt by the laboratory.

The reported results were obtained in compliance with the 2003 NELAC standards unless otherwise noted.

TestAmerica Laboratories, Inc. certifies that the analytical results contained herein apply only to the specific sample analyzed.

Approved By:



TestAmerica Cedar Falls
Shirley Thompson
Project Manager

Attachment 11 Page 9 of 14

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS
301 West 7th Street
Sioux City, IA 51103
Aaron Rochester

Work Order: CTJ0745
Project: TCLP Metals Only
Project Number: Recycletronics

Received: 10/13/10
Reported: 10/21/10 11:04

ANALYTICAL REPORT

Analyte	Sample Result	Data Qualifiers	Units	Quant Limit	Dilution Factor	Date Analyzed	Analyst	Reg. Limit	Method
Sample ID: CTJ0745-01 (Unleaded Glass - Misc. Solid)					**Sampled: 10/12/10 11:45**			**Recvd: 10/13/10 09:07**	
General Chemistry Parameters									
pH	**9.50**	H3	pH Units	0.100	1	10/19/10 14:00	tlr		SW 9045D
TCLP Metals									
Arsenic	<0.300		mg/L	0.300	1	10/18/10 09:07	cjt	5	SW 6010B
Barium	**1.09**		mg/L	0.100	1	10/18/10 09:07	cjt	100	SW 6010B
Cadmium	<0.0200		mg/L	0.0200	1	10/18/10 09:07	cjt	1	SW 6010B
Chromium	<0.0200		mg/L	0.0200	1	10/18/10 09:07	cjt	5	SW 6010B
Lead	**1.56**		mg/L	0.100	1	10/18/10 09:07	cjt	5	SW 6010B
Mercury	<0.00200		mg/L	0.00200	1	10/20/10 10:19	kmd	0.2	SW 7470A
Selenium	<0.150		mg/L	0.150	1	10/18/10 09:07	cjt	1	SW 6010B
Silver	<0.0200		mg/L	0.0200	1	10/18/10 09:07	cjt	5	SW 6010B
TCLP Extraction by EPA 1311									
TCLP Extraction Temp. Minimum	**19.4**	T6	°C	NA	1	10/14/10 11:39	rdm		SW 1311
TCLP Extraction Temp. Maximum	**23.0**		°C	NA	1	10/14/10 11:39	rdm		SW 1311

Attachment 11 Page 10 of 14

TestAmerica Cedar Falls
Shirley Thompson
Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS
301 West 7th Street
Sioux City, IA 51103
Aaron Rochester

Work Order: CTJ0745
Project: TCLP Metals Only
Project Number: Recycletronics

Received: 10/13/10
Reported: 10/21/10 11:04

SAMPLE EXTRACTION DATA

Parameter	Batch	Lab Number	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
TCLP Metals							
SW 6010B	10J0791	CTJ0745-01	50.00	50.00	10/15/10 15:17	NAS	SW 3010A - TCLP
SW 7470A	10J0985	CTJ0745-01	3.00	30.00	10/20/10 08:22	KMD	EPA 245.2/SW 7470

Attachment 11 Page 11 of 14

TestAmerica Cedar Falls
Shirley Thompson
Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive Cedar Falls, IA 50613 * 800-750-2401 * Fax 319-277-2425

RECYCLETRONICS	Work Order:	CTJ0745	Received: 10/13/10
301 West 7th Street			Reported: 10/21/10 11:04
Sioux City, IA 51103	Project:	TCLP Metals Only	
Aaron Rochester	Project Number:	Recycletronics	

DATA QUALIFIERS AND DEFINITIONS

H3 Sample was received and analyzed past holding time.

T6 The temperature during the 18 hour TCLP/SPLP extraction exceeded the 21-25 degrees C range stated in SW 1311/SW1312.

ADDITIONAL COMMENTS

TestAmerica Cedar Falls
Shirley Thompson
Project Manager

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

Cedar Falls Division
704 Enterprise Drive
Cedar Falls, IA

Phone: 319 - 277 - 2401 or 1 - 800 - 750 - 2401
Fax: 319 - 277 - 2425

Company: RecycleTronics DRAW
Send Report To: Aaron Rochester
Address: 301 West 7th Street
City/State/Zip Code: Sioux City, IA 51103
Telephone Number: 712-224-3158 Cell: 712-253-4547
Email Address for Reports to be sent: recycletronicsgm@centurytel.net
Sampled By: (Print Name) Aaron Rochester
(Signature)

Your PO #:
Invoice To:
Quote #:
Project Name:

PLEASE FILL IN GRAY AREAS

Project Number:
Project Manager:

Attachment 1 Page 13 of 14

Sample ID	Date Sampled	Time Sampled	# of containers shipped	Grab	Composite	Field Filtered	Preservative: Ice	HNO3 (Red & White Label)	HCl (Blue & White Label)	NaOH (Orange & White Label)	H2SO4 Plastic (Yellow & White Label)	H2SO4 Glass(Yellow & White Label)	None (Black & White Label)	Other (Specify)	Matrix: Groundwater	Wastewater	Drinking Water	Sludge	Soil	Waste	Analyze For: TCLP + 8 RCRA Metals (As, Ba, Cd, Cr, Pb, Hg, Se, Ag)	pH	RUSH TAT (Must call ahead!)	Standard TAT	E-mail results	Fax Results
				X									X							X	X	X					

NOTICE: **Pre-Arrangements must be made *AT LEAST 48 Hours in ADVANCE* to receive results with these turn around time commitments; Additional Charges may be assessed.**

NOTES:

Relinquished by:	Date	Time	Received by:	Date	Time	Relinquished by:	Date	Time
Received for TestAmerica by: Melissa Sassman	Date 10/13/10	Time 907	COC Seals Present and Intact? Yes No Shipped via:	Laboratory Comments:				

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

704 Enterprise Drive • Cedar Falls, IA 50613
800-750-2401 • 319-277-2425 Fax

Sample Receipt and Temperature Log Form

Client: Recycletronics Project: _____

City: _____

Date: 10-13-10 Receiver's Initials: CH Time (Delivered): 9.07

Temperature Record:

Cooler ID# (If Applicable)
SMW 3

0.2 °C / On Ice

☒ Temp Blank

☐ Temperature out of compliance

Thermometer:

☐ IR - 61997671 'B'
☒ IR - 90876942 'C'
☐ IR - 61854108
☐ 22126775

Courier:

☐ UPS	☐ TA Courier
☒ FedEx	☐ TA Field Services
☐ FedEx Ground	☐ Client
☐ US Postal Service	☐ Other
☐ Spee-Dee	

Custody seals present?
☒ Yes
Custody seals intact?
☐ Yes ☐ No

☐ Non-Conformance report started

Exceptions Noted

☐ Sample(s) not received in a cooler.

☐ Samples(s) received same day of sampling.

☐ Evidence of a chilling process

☐ Temperature not taken:

_____

***Refer to SOP CF-SS-01 for Temperature Criteria**

H:\QA Folder\QA Forms & Log Book pgs\Cooler Receipt rev15.doc

DOCUMENT CONTROL CHECK SHEET

Media:

Air	RCRA	Water	Other
	X		

Date of Inspection: 6/16/15

Facility/Site Name and Location: RECYCLETRONICS
3313 NORTHBROOK DR.
SIOUX CITY IA 51105

Document		Yes	No	NA
Final Report W/Attachments	73 Page(s)	(✓)	( )	( )
Field Sheet	0 Page(s)	( )	( )	(✓)
Chain-of-Custody Records	0 Page(s)	( )	( )	(✓)
Field Notes	2 Page(s)	(✓)	( )	( )
Analytical Data Sheets	0 Page(s)	( )	( )	(✓)
Photographic Negatives	0 Page(s)	( )	( )	(✓)
Photographs not included w/report	2 Page(s)	(✓)	( )	( )
Pre-Inspection Packet	0 Page(s)	( )	(✓)	( )
Other Documents (list below)		(✓)	( )	( )
CD ROM WITH 35 PHOTOS	1 Disc			
_____	_____ Page(s)			
_____	_____ Page(s)			

(Note: If additional space is needed to list specific documents, use the reverse side of this page.)

CERTIFICATION

I, the undersigned, certify that all of the documents pertaining to this activity that were in my possession have been listed above and were included in this package at the time this statement was signed.

Activity Leader's Signature

~~7/7/15~~ (MA) 7/24/15
Date Signed

Client: CO
Project No.: Recyclethonics
Date: 6/16/15
Page: 1 of 2
Made by: A. Wood
Checked by:
Preliminary: Final

Aaron Rochester

Closed loop refinery - Arizona > lead smelter
Doe Run - Viburnum
Glasseo in Mexico - new destination - have sent already
Kuzikowski - Peoria will be possible destination pending negotiation

truck arrives - unloaded to glass room - Separate leaded from non leaded - funnel is leaded, rest is non leaded based on testing
non leaded - Grill Hauling use for aggregate / fill
leaded - goes as is into box

no CRTs
~~nothing~~ goes out as is
yenter to another recycler
metal to Compressed Steel
plastic - baled & sold to another recycler (based on bid)

no vehicle maint
~~lamps~~ lamps - haven't changed since he's been here

batteries - to Dynamic Recycling

[D] materials to be processed
commodities

6 semi loads to be processed - in last month
stuff out back - 30 days or less - ~15 1-CY-YARD containers on W side, ~15 on E side

inside - about 1 month - 8 1-CY containers
one container totally falling apart
about 60 containers of loaded glass - maybe 6 months worth

Client:

Project No.: Date: 6/16/15

Recyclethronics

Page: 2 of 2

Made by: H. Wood

Checked by:

Preliminary: Final

about 200 containers awaiting processing in warehouse
about 40 containers of processed glass (mix of Pb and non-Pb)
or all Pb - all stuff in last 2 months - glass room

12 to 1-CY containers of non-Pb waiting collection -
about 2 weeks worth
Scrap - 20 CY per day

haven't shipped anything out this year

G. Rasso - he can send me paperwork - his computer is in the shop

his estimate of leaded glass - all here is less than 1 year
about 2500 lb per 1 CY container

annual inspection by fire department

PHOTO LOG
PHOTOGRAPHS NOT USED IN REPORT

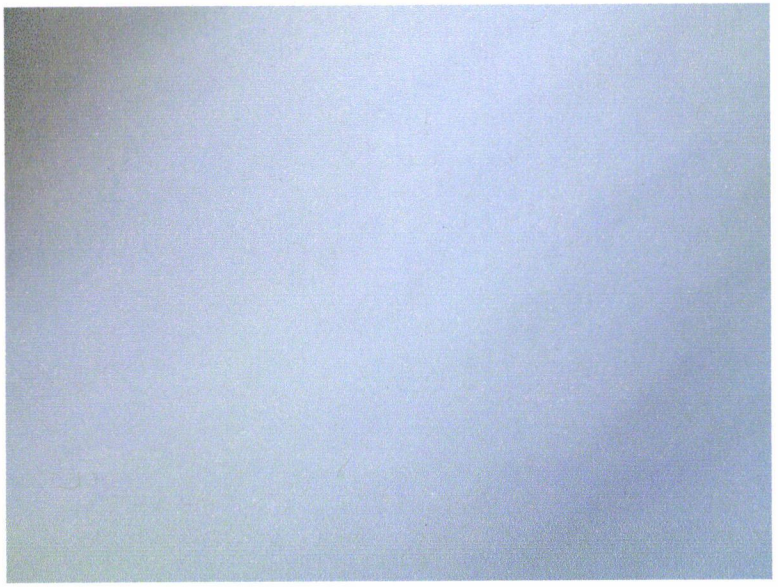
Facility Name / City: Recycletronics
3313 Northbrook Drive
Sioux City, Iowa

Facility ID #: non-notifier
Date: June 16, 2015
Photographer: Heather K. Wood
Type of Camera: iPhone 4S.
Digital Recording Media: Flashcard
All digital photos were copied by: Heather Wood on June 16, 2015.
All digital photos were copied to: Tetra Tech, Inc. laptop computer
Original copy is stored in: Tetra Tech, Inc.'s internal office server. Digital photos were downloaded to server by Heather Wood. No changes were made in the original image files prior to storage on the server.

Unused Photo #	Photographer	Date	Approx. Time	File Name	Description
1	Heather Wood	6/16/15	1007	Recyc_034.jpg	This photograph was not used for the report.
2	Heather Wood	6/16/15	1000	Recyc_035.jpg	This photograph was not used for the report.

Recycletronics
Sioux City, Iowa
Photographs Not Used in Report

RCRA Enforcement and Permitting Assistance (REPA) Zone 3 Task Order 020	DESCRIPTION	This photograph was not used for the report.	1
	CLIENT	U.S. Environmental Protection Agency (EPA)	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	



REPA Zone 3 Task Order 020	DESCRIPTION	This photograph was not used for the report.	2
	CLIENT	U.S. EPA	Date 6/16/15
	PHOTOGRAPHER	Heather Wood	